obtaining nearby relationship data for a subject element in the structure, the nearby relationship data indicating information about nearby node-link relationships, the nearby relationship data excluding relationships with at least one element of the node-link structure; and

based on only the nearby relationship data, obtaining layout data identifying the subject element's position in the space with negative curvature.

28. (New) A method of transferring data between first and second machines over a network, the second machine including memory and a processor connected for accessing the memory; the memory being for storing instruction data; the method comprising:

establishing a connection between the first and second machines over the network; and

operating the first and second machines to transfer instruction data from the first machine to the memory of the second machine; the instruction data indicating instructions the processor can execute; the processor, in executing the instructions, laying out a node-link structure in a space with negative curvature; the processor, in laying out the node-link structure:

obtaining nearby relationship data for a subject element in the structure, the nearby relationship data indicating information about nearby node-link relationships, the nearby relationship data excluding relationships with at least one element of the node-link structure; and

based on only the nearby relationship data, obtaining layout data identifying the subject element's position in the space with negative curvature.

Remarks

The above Amendments and these Remarks are in reply to the Final Office action mailed March 11, 2002. The fee for addition of new claims is included herewith. A REQUEST FOR CONTINUED EXAMINATION is also submitted herewith, together with the appropriate fee.

Claims 1-15 were pending in the Application prior to the outstanding Office Action. In the Office Action, the Examiner rejected all pending claims. The present Response does not cancel or replace any of the rejected claims, but does add new claims 16-28, leaving for the Examiner's present consideration claims 1-28. Reconsideration of the rejections is requested.

I. · ART REJECTION

The Examiner rejected claims 1-15 under 35 U.S.C. 102(b) as being anticipated by Lamping et. al. U.S. Patent No. 5,619,632. Applicants will discuss the rejection of Independent Claim 1 first, followed by the rejections of claims 2-15.

A. Independent Claim 1

The Examiner rejected independent claim 1 as being anticipated by Lamping.

In Paragraph 5C of the Office Action, the Examiner argues that Lamping teaches the method being "based on the nearby relationship data, obtaining layout data indicating the element's position relative to a parent in the space with negative curvature." The Examiner then cites three portions of Lamping that he believes teaches this element of Applicants' claim 1, and makes additional comments in the Response to Arguments.

However, none of the cited parts of Lamping teach the step of "obtaining layout data indicating the element's position *relative* to a parent in the space with negative curvature," nor do they teach a step of obtaining such relative layout data "*based on the nearby relationship data*," both as called for in Applicants' claim 1. The Office Action therefore, it is submitted, fails to make a *prima facie* case of anticipation.

1. Lamping, Col. 16, lines 53-63

The Examiner cites Lamping, Col. 16, lines 53-63 as teaching this element of claim 1. But Lamping here says that layout data is obtained "*indicating positions* for parts of the node-link structure" in layout space. He does not teach that the positions be indicated "*relative to a parent*" in the space with negative curvature, as called for in Applicants' claim 1. They could just as easily have been indicated in absolute terms, not relative to anything.

2. Lamping Figs. 5-7

The Examiner also cites Lamping Figs. 5-7 as teaching this element of claim 1. But what is described here is a method for displaying a node-link structure that was *already previously laid out in layout space* (the space with negative curvature). Lamping, Col. 17, lines 28-33. This is a transformation and mapping function that converts positions of the elements from layout space into the two-dimensional display space, which does not have negative curvature. It is not a method of

laying out a node-link structure in a space with negative curvature, as called for in Applicants' claim 1. For this reason alone, the cited teaching is not relevant to Applicants' claim 1.

In addition, neither Figs. 5-7 nor its accompanying text (Lamping, Cols. 17-18) state the *form* in which the positions of features in the node-link structure were represented in the layout space, and specifically do not state that they were represented in a form which indicated "the element's position *relative* to a parent" in the space with negative curvature, as called for in Applicants' claim 1.

Certainly nothing in Figs. 5-7 or its accompanying text teach a step of obtaining layout data in such relative form, "based on the nearby relationship data," again as called for in Applicants' claim 1.

3.   Lamping, Col. 32, lines 19-35

Finally, the Examiner cites Lamping, Col. 32, lines 19-35 as teaching this element of claim 1. This cited text is part of a claim in the Lamping patent, which calls for a step of using node-link data to present a sequence of representations of the node-link structure on a display (e.g. an animation), each representation in the sequence having certain characteristics. In the part of the claim cited by the Examiner, it is stated that lower level node features in each representation are to have centers of area *positioned* at particular places so that they are perceptible as a group of related node features.

But again, this is a statement of how the node-link structure is to appear in *two-dimensional display space*, not how it is to be represented in a layout space that has negative curvature. It is not a "method of laying out a node-link structure in a space with negative curvature," as called for in Applicants' claim 1. For this reason alone, again, the cited teaching is not relevant to Applicants' claim 1.

And as with Lamping's Figs. 5-7, the cited claim language also fails to state the *form* in which the positions of features in the node-link structure are to be represented in *any* space, and specifically does not state that they are to be represented in a form "indicating the element's position *relative* to a parent" in a space with negative curvature, as called for in Applicants' claim 1.

The cited language of Lamping does not even say that the elements' positions are *ever* laid out in a space with negative curvature (as called for in Applicants' claim 1), either *before or after* the method steps called for in the cited language!

Application No.: 09/124,805

8

Certainly nothing in the Lamping claim language cited by the Examiner teaches a step of obtaining layout data in relative form, "based on the nearby relationship data," again as called for in Applicants' claim 1.

4. Examiner's Response To Arguments

In the final Office Action, the Examiner included a "Response to Arguments" in which the Examiner states that Lamping "teaches the step of obtaining nearby relationship data and obtaining layout data based on the nearby relationship data."

But that is not what is called for in Applicants' claim 1.

Applicants' claim 1 calls for a step of "obtaining layout data *indicating the element's position relative to a parent in the space with negative curvature*" based on the nearby relationship data.

The excerpts of Lamping cited by the Examiner do not teach or suggest Applicants' step of "obtaining layout data *indicating the element's position relative to a parent in the space with negative curvature*" based on the nearby relationship data.

* * * * *

Applicants' claim 1 calls for, among other things, a step of

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based on the nearby relationship data, obtaining layout
data indicating the element's position relative to a
parent in the space with negative curvature.
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Nothing in the reference cited by the Examiner teaches or suggests this feature, and as such, the reference cannot anticipate Applicants' claim 1. Accordingly, Applicants respectfully submit that the Examiner has failed to make a *prima facie* case that claim 1 is unpatentable over Lamping.

B. Claims 2-12

Claims 2-12 all depend ultimately from independent claim 1 and should therefore be allowable for at least the same reasons. These claims also add their own limitations which, it is submitted, render them patentable in their own right. Applicants respectfully reserve the right to point out such limitations in a future document should it become necessary at that time.

Application No.: 09/124,805

C.   Claims 13-15

Claims 13-15 are independent claims all containing limitations similar to those in independent claim 1. These claims should all be patentable for many of the same reasons as set forth above with respect to claim 1.

II.   CONCLUSION

The new claims are submitted to more particularly point out the invention.

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application should be allowable, and a Notice of Allowance is requested. The Examiner is respectfully requested to telephone the undersigned if he can assist in any way in expediting issuance of a patent.
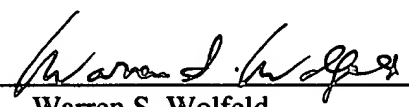
Enclosed is a REQUEST FOR CONTINUED EXAMINATION transmittal form, together with the appropriate fee.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-0869 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: June 11, 2002   By: _____
                                                Warren S. Wolfeld
                                                Reg. No. 31,454

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